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Signature Page*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

WYATT B., *et al.*,

Plaintiffs,

v.

TINA KOTEK, *et al.*,

Defendants.

Case No. 6:19-cv-00556

**PLAINTIFFS' OBJECTIONS TO
DEFENDANTS' TRIAL EXHIBITS**

In accordance with the Court's Stipulated Amended Case Schedule, ECF 377, Plaintiffs submit the following objections to Defendants' proposed trial exhibits. Plaintiffs reserve all rights to object to Defendants' exhibits at trial pursuant to the Federal Rules of Evidence and depending on the purpose for which an exhibit is offered.

No.	Description	Objections
1001	Oregon Child Welfare Vision for Transformation (2020)	
1002	Oregon Child Welfare Vision for Transformation 2021 Update (July 2022)	
1003	Oregon Child Welfare Vision for Transformation 2022 Update (Oct. 2023)	
1004	ODHS Child Welfare 2023 Procedure Manual (rev. Aug. 23, 2023)	
1005	Governor Brown's Executive Order 19-03, Establishing an Oversight Board to Address the Crisis in Oregon's Child Welfare System (Apr. 18, 2019)	
1006	Governor Brown's Executive Order 19-08, Ensuring Equal Treatment Under Law to Oregon's LGBT+ Community (Oct. 25, 2019)	
1007	Public Knowledge Report to Gov. Kate Brown (Sept. 13, 2016)	
1008	Public Knowledge Assessment Findings Report (Dec. 15, 2023)	
1009	2018 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Mar.-Dec. 2018)	
1010	2019 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Dec. 2019)	

1011	2020 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Dec. 2020)	
1012	2021 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Dec. 2021)	
1013	2022 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Dec. 2022)	
1014	2023 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Dec. 2023)	
1015	2024 Oregon Department of Human Services Child Welfare Monthly Progress Reports (Jan.-Mar. 2024)	
1016	2018 Annual Progress & Service Report (Covering Activities July 1, 2016 - June 30, 2017) and Attachments 1-15 (Submitted June 2017)	
1017	2019 Annual Progress & Service Report (Covering Activities July 1, 2017 - June 30, 2018) and Attachments 1-18 (Submitted June 2018)	
1018	2020 Annual Progress & Service Report (Covering Activities July 1, 2018 - June 30, 2019) (Submitted June 2019)	
1019	2021 Annual Progress & Service Report and Attachments 1-41 (Submitted June 2020)	
1020	2022 Annual Progress & Service Report and Attachments 1-38 (Submitted June 2021, Resubmitted Aug. 2021)	

1021	2023 Annual Progress & Service Report and Attachments 1-43 (Submitted June 30, 2022)	
1022	2024 Annual Progress & Service Report and Attachments 1-46 (Submitted June 30, 2023)	
1023	ODHS Child Welfare Caseload Ratio Standards (rev. 1/20/22)	
1024	Selected 2022-2024 Dept. of Human Services, Child Welfare Caseload Dashboard Screenshots	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1025	2016-2022 Child Welfare Data Books (submitted 2017-2023)	
1026	Secretary of State Audit, Report 2018-05, Foster Care in Oregon: Chronic management failures and high caseloads jeopardize the safety of some of the state's most vulnerable children (Jan. 2018)	
1027	Secretary of State Audit, Report 2019-24, Recommendation Follow-Up Report: DHS Has Made Important Improvements, but Extensive Work Remains to Ensure Child Safety (June 2019)	
1028	Office of the Foster Care Ombuds, Fiscal Year 2021 (Nov. 16, 2021); 2023 Six Month Report (Jan. 2024)	
1029	System of Care Advisory Council, System of Care Plan for Oregon, Two-Year Strategic Plans: 2022/2023 (Nov. 1, 2021) and 2022-2025 Update (Dec. 2023)	

1030	System of Care Advisory Council Bylaws (adopted May 3, 2023)	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402) • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Lack of foundation.
1031	Recommendations from the Safety Workgroup, System of Care Advisory Council (May 2023)	
1032	SANKOFA Brochure	<ul style="list-style-type: none"> • Lack of foundation. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. (FRE 403) <p>Authentication. The exhibit has not been properly authenticated. (FRE 901); Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106)</p>
1033	Continuum of Care - Overview of Services Offered Through Oregon State Agencies (Sept. 9, 2023)	<ul style="list-style-type: none"> • Lack of Foundation. Authentication. The exhibit has not been properly authenticated. (FRE 901) • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues. (FRE 403)
1034	CPS Assessment Fidelity Review Statewide & Comparison Reports (May 2022)	
1035	Practice Performance Reports, Oregon Continuous Quality Improvement (CQI) (2024)	
1036	District 12 Child Welfare Continuous Quality Improvement (CQI) Action Plan (June 15 2023), Service Strategy Deck, and Delivery Data Report (SDDR) (2023)	
1037	Midtown Child Welfare Continuous Quality Improvement (CQI) Action Plan (Sept. 28, 2023), Service Strategy Deck, and Delivery Data Report (SDDR) (2024)	

1038	Oregon Dept. of Human Services, Child Welfare Certification Quality Assurance Process & File Prep (Apr. 2023)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. (FRE 403) • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106)
1039	Oregon Dept. of Human Services, Child Welfare Permanency Quality Assurance Review Tool (Mar. 2024)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues. (FRE 403) • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106)
1040	Oregon Dept. of Human Services, Child Welfare Social Service Specialist 1 (SS1) 12-Month Training Plan (Sept. 2023)	
1041	Oregon Dept. of Human Services, Child Welfare Social Service Specialist 1 (SS1) On-Ramp (Oct. 21, 2021)	
1042	Oregon Dept. of Human Services, Child Welfare Course Summary, Applying the ADA to Your Work with Children and Families	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of Foundation.
1043	Portland State University Child Welfare Partnership Training Unit, Trauma-Informed Practice Strategies (TIPS) for Child Welfare Workers (Mar. 28-29, 2024)	

1044	Oregon Dept. of Human Services, Child Welfare Resource Parent Training Menu (Mar. 15, 2024)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of Foundation.
1045	Oregon Dept. of Human Services, Child Welfare Resource Parent Training Session 4, Trauma-Related Behaviors Facilitators Guide (Mar. 2023)	
1046	Oregon Dept. of Human Services, Child Welfare Resource Parent Training Session 8, Creating a Stable, Nurturing, and Safe Home Environment Facilitators Guide (Mar. 2023)	
1047	Oregon Dept. of Human Services, Child Welfare, Independent Living Program (ILP) Transition Readiness Discussion Guide, Youth Assessment Summary, Transition Plan, and ILP Service Planning Check List	
1048	Oregon Dept. of Human Services, Child Welfare, Independent Living Program (ILP) Transition Flyers re Services and Resources (2022-2023)	
1049	ODHS Child Welfare 2016 Procedure Manual	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402) • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. (FRE 403) • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. (FRE 801 and 802).
1050	U.S. Dept. of Health & Human Services, Admin. for Children & Families, Child & Family Services Reviews (CFSR) Fact Sheet (2015)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.

1051	U.S. Dept. of Health & Human Services, Admin. for Children & Families, Child & Family Services Reviews (CFSR), Statewide Assessment Instrument (Mar. 25, 2016)	
1052	U.S. Dept. of Health & Human Services, Admin. for Children & Families, Child & Family Services Reviews (CFSR), Oregon Final Report 2016 (Jan. 17, 2017)	
1053	Oregon Dept. of Human Services, Child and Family Services Review Round 3 Program Improvement Plan (PIP) (re-submitted Aug. 30, 2018)	
1054	Children's Bureau, Oregon Child and Family Services Review Round 3 Program Improvement Plan (PIP), 2018-2020 Progress Reports (Q1-Q8, Submitted 2018-2020)	
1055	Oregon Dept. of Human Services, Oregon CFSR Round 3, Non-Overlapping Period (NOP) 2020 Reports (Q1-6, Submitted 2021-2022)	
1056	Oregon Dept. of Human Services, Child Welfare, Child and Family Services Plan (CFSP) 2020-2024 and Attachments 1-22 (Submitted June 2019)	
1057	U.S. Dept. of Health & Human Services, Admin. for Children & Families, Closeout Letter to Oregon Dept. of Human Services re Program Improvement Plan (PIP) (July 14, 2022)	

1058	U.S. Dept. of Health & Human Services, Children's Bureau, General Findings from the Federal Child and Family Services Reviews Summary of the Results of the 2001 - 2004 Child and Family Services Reviews. Retrieved from https://www.acf.hhs.gov/sites/default/files/documents/cb/summary_of_the_results_of_the_2001_2004_cfsr.pdf	
1059	U.S. Dept. of Health & Human Services, Children's Bureau, Child and Family Services Reviews (CFSR) Round 3 Statewide Data Indicators Workbook, May 2022. Retrieved from https://www.cfsrportal.acf.hhs.gov/resources/round-3-resources/cfsr-round-3-statewide-data-indicators/cfsr-round-3-statewide-data	
1060	Plaintiffs' Amended Response and Objections to Defendants' Third Set of Interrogatories (Interrogatory #5), (Mar. 14, 2024)	
1061	Child Welfare League of America, Child Welfare Consent Decrees: Analysis of Thirty-Five Court Actions from 1995 to 2005 (Oct. 2005)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of Foundation. • Lay opinion or legal conclusion. The exhibit contains an impermissible opinion by a lay witness that is not helpful to determining a fact in issue, and is not based on scientific, technical, or other specialized knowledge. (FRE 701; <i>see also</i> FRCP 26) • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)

1062	Child Welfare Information Gateway, Children's Bureau, State Statutes Current Through May 2022, Definitions of Child Abuse and Neglect (2022)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1063	Oregon Dept. of Human Services, Child Welfare, Oregon Foster Childrens Bill of Rights (July 2017)	
1064	Effective Hotline Elements: Supporting accurate and reliable screening decisions, Casey Family Programs, Strategy Brief (Nov. 2017), available at https://www.casey.org/media/Effective-hotline-elements_strategy-brief.pdf .	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1065	Oregon Child Abuse Hotline (ORCAH) Child Abuse Hotline Assignment and Workload Data (Apr. 2019)	
1066	Oregon Child Abuse Hotline (ORCAH) C.A.R.E. Card, Introduction Discussion Materials, Alvarez & Marsal (Oct. 21, 2019)	
1067	Oregon Child Abuse Hotline (ORCAH) Sample Screening Reports (Mar. 6, 2017 & Jan. 14, 2023) – contains confidential/AEO information	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106)
1068	ORCAH Newsletter (Spring 2020)	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402) • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. (FRE 403)
1069	Child Welfare Updates & Oregon Child Abuse Hotline (ORCAH) (May 10, 2021)	

1070	2022-2023 Oregon Child Abuse Hotline (ORCAH) Annual Reports	
1071	Oregon Child Abuse Hotline (ORCAH) Quarterly Report 2022, Third Quarter	
1072	Oregon Child Abuse Hotline (ORCAH) Sample Screening Report Quality Assurance Tool (Jan. 2023 & Q2 2024)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106)
1073	Oregon Child Abuse Hotline (ORCAH) Training Academy Outline (Oct. 2023)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. (FRE 901)
1074	Oregon Dept. of Human Services, Oregon Child Abuse Hotline (ORCAH) SDM Screening and Response Time Assessment, Rule and Procedures Manuals (July 2022 & Feb. 2024)	
1075	Oregon Dept. of Human Services, Oregon Child Abuse Hotline Continuous Quality Improvement (Jan. 16, 2020)	
1076	Oregon Child Abuse Hotline (ORCAH) Presentation (Aug. 2, 2022)	
1077	Oregon Child Abuse Hotline (ORCAH) Screening Program Presentation (Sept. 12, 2018)	
1078	Curriculum Vitae of Uma Ahluwalia, MSW, MHA	
1079	Curriculum Vitae of James Dimas	
1080	Curriculum Vitae of Bowen McBeath	

1081	Curriculum Vitae of Stacey Moss, JD, CWLS, PMP	
1082	Curriculum Vitae of Cynthia Richter- Jackson, MSW	
1083	Curriculum Vitae of Dr. Sarah Vinson, MD	
1084	Excerpt of CFSR Round 3 Statewide Data Indicators Workbook, May 2022, with work product of Jim Dimas. Originally retrieved from https://www.cfsrportal.acf.hhs.gov/resources/round-3-resources/cfsr-round-3-statewide-data-indicators/cfsr-round-3-statewide-data	
1085	Chart re Texas Third-Party Monitoring Fees Invoices	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. (FRE 801 and 802) • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402) • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. (FRE 403)
1086	Public Catalyst Invoices re Third-Party Monitoring in <i>M.D. v. Abbott, et al.</i> , USDC Case No. 2:11-cv-00084 (S.D. Tex.) (work performed July 2019 - Jan 2024)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402) • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the

		<p>truth of the matter asserted and is not subject to any hearsay exception. (FRE 801 and 802)</p> <ul style="list-style-type: none"> • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues, misleading the trier of fact, and causing undue delay. (FRE 403)
1087	Declaration of Custodian of Records John Langford re Oklahoma Third-Party Neutral Monitoring Invoices (Apr. 11, 2024)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1088	Public Catalyst Invoices re Third-Party Neutral Monitoring in <i>D.G. v. Henry, et al.</i> , USDC Case No. 4:08-cv-00074-GKF-fhm (N.D. Okla.) (work performed July 2017 – Mar. 2024)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery; Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of Foundation; Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402) • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. (FRE 801 and 802) • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues, misleading the trier of fact, and causing undue delay. (FRE 403)
1089	Oregon Dept. of Human Services, Examples of Communicating Effectively (Individuals Who Are Blind; Individuals Who are Deaf or Hard of Hearing; People Who Have an Intellectual and Development Disabilities; People Who Have Substance Use Disorder or Alcohol Use Disorder)	<ul style="list-style-type: none"> • Lack of Foundation. • Authentication. The exhibit has not been properly authenticated. (FRE 901)
1090	What is a Sensory Room?	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)

1091	D10 Sensory Room Instructions/Ideas (Oct. 5, 2022)	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1092	Oregon Dept. of Human Services, Child Welfare, Resource Parent Guide: Supporting Children & Youth with Disabilities (Mar. 7, 2024)	<ul style="list-style-type: none"> • Lack of Foundation. • Authentication. The exhibit has not been properly authenticated. (FRE 901)
1093	Screenshots of Child Welfare Equity, Training and Workforce Development Sharepoint (15 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with Plaintiffs.
1094	Screenshots of Child Welfare Training Sharepoint (10 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with Plaintiffs.
1095	<i>CASA for Children, et al. v. State of Oregon, et al.</i> , United States District Court for the District of Oregon, Case No. 3:16-cv- 018195-YY, Final Report of the Special Master (Feb. 29, 2024) and Revised Final Order (Mar. 14, 2024)	
1096	Screenshots of Executive Dashboard, Smart Sheets Dashboard (21 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1097	Screenshots of Executive Dashboard, Respite Care Dashboard (5 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106)

		<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with Plaintiffs.
1098	Maltreatment in Foster Care by Year Comparison (Apr. 2024)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of Foundation.
1099	Oregon Dept. of Human Services, Child Welfare, Behavioral Rehabilitation Services Referral (Mar. 7, 2019) – contains confidential/AEO information	
1100	Shelter Order re Kylie & Alec – contains confidential/AEO information	
1101	Email re A and K in the press? (Apr. 16, 2019) – contains confidential/AEO information	
1102	Citizen Review Board (CRB) Findings and Recommendations re Kylie & Alec – contains confidential/AEO information	
1103	Letter to Judge from Annette Smith re Response to Court's Criticism re Unique – contains confidential/AEO information	
1104	Testimony of Annette Smith re SB 825 (Apr. 10, 2019)	
1105	Review Judgment re Norman – contains confidential/AEO information	
1106	Citizen Review Board (CRB) Findings and Recommendations re Norman – contains confidential/AEO information	

1107	Review Judgment re Norman – contains confidential/AEO information	
1108	Screenshots of Federal Performance Dashboard, retrieved from https://www.oregon.gov/odhs/data/ pages/cw -dashboards-fpm.aspx	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with Plaintiffs.
1109	Summary of 2017-Present Policy Option Package (POP) Legislative Asks from ODHS, Child Welfare	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Confusing, misleading, prejudicial. The exhibit was not produced during discovery. • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106)
1110	Summary of 2017-Present Policy Option Package (POP) Legislative Asks from Oregon Health Authority (OHA)	<ul style="list-style-type: none"> • Lack of Foundation; Authentication. The exhibit has not been properly authenticated. (FRE 901) • Untimely. The exhibit was not produced during discovery. • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106)
1111	Collection of 2017-2019 Child Welfare Agency Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.
1112	Collection of 2017-2019 Legislatively Adopted Child Welfare Agency Budget Policy Option Packages (POP)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.
1113	Collection of 2019-2021 Child Welfare Agency Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.
1114	Collection of 2019-2021 Child Welfare Governor's Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.

1115	Collection of 2019-2021 Legislatively Adopted Child Welfare Budget Policy Option Packages (POP)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.
1116	Collection of 2019-2021 Oregon Health Authority Agency Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.
1117	Collection of 2019-2021 Oregon Health Authority Governor's Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.
1118	Collection of 2019-2021 Legislatively Adopted Oregon Health Authority Budget Policy Option Packages (POP)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.
1119	Collection of 2021-2023 Child Welfare Agency Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.
1120	Collection of 2021-2023 Child Welfare Governor's Budget Policy Option Package (POP) Budget Requests	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.
1121	Collection of 2021-2023 Legislatively Adopted Child Welfare Budget Policy Option Packages (POP)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.
1122	Collection of 2021-2023 Oregon Health Authority Agency Budget Policy Option Package (POP) Budget Requests	
1123	Collection of 2021-2023 Oregon Health Authority Governor's Budget Policy Option Package (POP) Budget Requests	
1124	Collection of 2021-2023 Legislatively Adopted Oregon Health Authority Budget Policy Option Packages (POP)	

1125	Collection of 2023-2025 Child Welfare Agency Budget Policy Option Package (POP) Budget Requests	
1126	Collection of 2023-2025 Child Welfare Governor's Budget Policy Option Package (POP) Budget Requests	
1127	Collection of 2023-2025 Legislatively Adopted Child Welfare Budget Policy Option Packages (POP)	
1128	Collection of 2023-2025 Oregon Health Authority Agency Budget Policy Option Package (POP) Budget Requests	
1129	Collection of 2023-2025 Oregon Health Authority Governor's Budget Policy Option Package (POP) Budget Requests	
1130	Collection of 2023-2025 Legislatively Adopted Oregon Health Authority Budget Policy Option Packages (POP)	
1131	Comparing States' Statutes on Child Welfare Jurisdiction (Nov. 6, 2023)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1132	Screenshots of District 2 Caseload Reports & Trends Dashboards (14 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Improper AEO designation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with Plaintiffs.

1133	Screenshots of Executive Dashboards (15 images)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of Foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with Plaintiffs.
1134	Oregon Dept. of Human Services, Child Welfare, Treatment Services Referral Form (Oct. 2021)	
1135	2020-2024 Memoranda re Psychiatric Residential Treatment Services (PRTS) and Psychiatric Residential Treatment Facility (PRTF) Capacity (Jan. 7, 2020 - Jan. 11, 2024)	<ul style="list-style-type: none"> • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. (FRE 403) • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. (FRE 801 and 802) • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. (FRE 901)
1136	Oregon Dept. of Human Services, Child Welfare, Treatment Services Capacity Tracking Charts (Feb. 2024)	<ul style="list-style-type: none"> • Lack of foundation. • Authentication. The exhibit has not been properly authenticated. (FRE 901)
1137	Oregon Dept. of Human Services, Child Welfare, Safe Sleep Checklist (Nap and Nighttime) (Jan. 2022)	
1138	Oregon Dept. of Human Services, Child Welfare, Comprehensive Statewide Plan to Prevent Child Maltreatment Fatalities (Apr. 2023)	
1139	Oregon Dept. of Human Services, Child Welfare, Youth Suicide Assessment in Various Environments (Mar. 25, 2024)	

1140	Oregon Dept. of Human Services, Child Welfare, CIRT Process Map	
1141	Oregon Dept. of Human Services, Child Fatality Prevention & Review Program, History of CIRT Assignments (Mar. 2024)	
1142	Portland State University Oregon DHS QPR Suicide Prevention Training, Pre- and Post- Training Survey Data Report (July 1, 2020 through Dec. 31, 2023) (prepared Feb. 2024)	
1143	Oregon CPS Assessment Review Outline (last modified Jan. 2024)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1144	2022-2023 Child Welfare Family Preservation Accomplishments	
1145	Leveraging Intensive Family Engagement (LIFE) Final Evaluation Report: Executive Summary (Mar. 2020) and Oregon's IV-E Waiver Demonstration Project, Final Evaluation Report (Mar. 2020)	
1146	Oregon Dept. of Human Services, News Release, Oregon Selected by Doris Duke Foundation for Grant Funding Work (Mar. 11, 2024)	
1147	Oregon Health Authority Memo to Oregon State Legislature re HB 3372 Health Assessment Metrics for Foster Children (Sept. 20, 2019)	
1148	2018-2022 Oregon Health Authority CCO Metrics Annual Performance Reports (July 2019 - Aug. 2023)	

1149	2022 CCO Performance Metrics Data Dashboard	
1150	Oregon Health Authority, 2023 CCO Quality Incentive Program: Measure Summaries (Jan. 2023)	
1151	2024 Oregon Health Authority CCO Specifications for Measure re Timely Medical and Mental Health Assessments for Children in DHS Custody (Dec. 2023)	
1152	Oregon Health Authority Coordinated Care Organization (CCO) 2.0 and DHS Service Areas Map (rev. 09/2020)	
1153	Oregon Dept. of Human Services, Child Welfare, Intake Nursing Assessment Form (CF 0174) (rev. 2023.11.01)	
1154	Oregon Dept. of Human Services, Blank CANS Worksheet Forms re 0-5 and 6-20 Years Old	
1155	HCC Log Area 2 for Nov - Dec 2023 – contains confidential/AEO information	<ul style="list-style-type: none"> • Lack of Foundation. • Authentication. The exhibit has not been properly authenticated. (FRE 901)
1156	HCC Log Area 6 for Nov - Dec 2023 – contains confidential/AEO information	<ul style="list-style-type: none"> • Lack of Foundation • Authentication. The exhibit has not been properly authenticated. (FRE 901)
1157	2022-2024 HB 2333 Reports on Psychotropic Medication to Children in Foster Care (July 2022 – Apr. 2024)	<ul style="list-style-type: none"> • Mislabeled.
1158	U.S. Dept. of Health and Human Services, Administration for Children and Families, Children's Bureau, A National Look at the Use of Congregate Care in Child Welfare (May 13, 2015)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)

1159	Chart of Disability Diagnosis Counts, Sept. 2022 - Dec. 2023	<ul style="list-style-type: none"> • Lack of Foundation. • Authentication. The exhibit has not been properly authenticated. (FRE 901)
1160	System of Care Advisory Council Investment Update (Oct. 1, 2021)	
1161	Reunification *Case Reading Data Matrix/Phase 2 of Reviews, Seven Parts Completed by Patricia Rideout, Sue Steib, and Reviewers, and Handwritten Notes – contains confidential/AEO information	<ul style="list-style-type: none"> • Plaintiffs object to the characterization of this exhibit as inaccurate and misleading.
1162	Case Review Instrument prepared by Patricia Rideout and Sue Steib	
1163	List of Data Sources provided to Patricia Rideout and Sue Steib	
1164	Invoices for Patricia Rideout (Jan. 2023 - Jan. 2024)	
1165	Invoices for Sue Steib (Jan. 2023 - Jan. 2024) – contains confidential/AEO information	
1166	Case Review Instruments Completed by Patricia Rideout, Sue Steib, and Reviewers, and Handwritten Notes – contains confidential/AEO information	
1167	Screenshots of Family Preservation Dashboard	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with Plaintiffs.

1168	Screenshots of Family Preservation Data Dashboard	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with Plaintiffs.
1169	Group Placements Data - Oregon (Sept. 30, 2022)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1170	Congregate Care Trends - Oregon (Apr. 3, 2022)	
1171	Chart Summarizing Child and Family Services Reviews (CFSR) Round 3 Final Reports for All 50 States	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Untimely. The exhibit was not produced during discovery.
1172	Child and Family Services Reviews (CFSR) Round 3 Final Reports for All 50 States	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402) • Undue delay. The exhibit's probative value is substantially outweighed by a danger of undue delay. (FRE 403)
1173	Work Culture and How to Rise Up, Equity/Rise Curriculum for Managers and Supervisors	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1174	Data Review of Disproportionality and Branch Trends in District 2 (2022)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1175	D2 Safety Sustainability 2024 (updated 2/27/2024)	
1176	District 2 CW Dashboard Outcomes for February 2024	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.

1177	D2 Child Welfare 2023 Highlights Presentation	
1178	KEEP Services in Oregon, Oregon Social Learning Center Developments, Inc.	<ul style="list-style-type: none"> • Misabeled.
1179	Public Knowledge® Child Welfare Experience and Qualifications, Prior Child Welfare Assessment Related Projects, Prior Projects Related to a Child Welfare Federal Class Action Lawsuit, Prior Child Welfare Projects in Oregon, and Child Welfare Experience Map	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery.
1180	DHS Child Welfare Workgroup Charter: CW Statewide CQI Workgroup (04/08/21)	
1181	Child Welfare Continuous Quality Improvement (CQI) Workgroup: Recommendations for Statewide CQI Structure (Oct. 19, 2021)	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1182	Oregon Child & Family Center for Excellence Welcome Presentation (last modified Mar. 2024)	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1183	2021 Resource Family Retention Recruitment Champion Team Reports (Mar. 2021 - Dec. 2021)	
1184	2022 Resource Family Retention Recruitment Champion Team Reports (Jan. 2022 - Sept. 2022)	
1185	2023 Resource Family Retention Recruitment Champion Team Reports (Jan. 2023 - Dec. 2023)	
1186	2024 Resource Family Retention Recruitment Champion Team Reports (Jan. 2024)	

1187	Dept. of Human Services, Oregon Child Welfare Racial Equity and Social Justice Workbook (Mar. 25, 2022)	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1188	Email from Rebecca Jones Gaston to Aprille Flint-Gerner and Lacey Andresen re Gratitude to Team Polk (Aug. 5, 2022)	<ul style="list-style-type: none"> • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. (FRE 801 and 802) • Authentication. The exhibit has not been properly authenticated. (FRE 901)
1189	Child Welfare Email re Update regarding D2 CPS Assessment Surge (Oct. 27, 2022)	<ul style="list-style-type: none"> • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. (FRE 801 and 802) • Authentication. The exhibit has not been properly authenticated. (FRE 901)
1190	Dept. of Human Services, Demonstration Site Meeting Minutes (Jan. 10, 2023)	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1191	Child Welfare District Listening Tour (Apr. 12, 2019)	
1192	Dept. of Human Services Letter to Secretary of State Kip Memmott in Response to Final Draft Audit Report (Jan. 29, 2018)	
1193	Oregon's Child, Youth & Family Continuum of Care (Mar. 6, 2018)	
1194	Press Release, Oregon Department of Human Services Announces Plan to Serve Youth in Oregon (Apr. 10, 2019)	
1195	Dept. of Human Services, Improving Child Welfare, Overview of Improvements (last updated Jan. 31, 2020)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Confusing, misleading, prejudicial. The exhibit's probative value is substantially outweighed by a danger of confusing the issues and misleading the trier of fact. (FRE 403)

1196	Dept. of Health & Human Services, Administration for Child and Families Letter to Rebecca Jones Gaston Approving PIP Extension (Aug. 31, 2020)	
1197	Dept. of Human Services, Welcome Community Partners and External Stakeholders, Budget Briefing (Dec. 11, 2020)	
1198	Dept. of Health & Human Services, Administration for Child and Families Letter to Rebecca Jones Gaston re Title IV- E Prevention Program 5-Year Plan (Apr. 1, 2021)	
1199	Screenshots of BRS Dashboard	<ul style="list-style-type: none"> • Incomplete. The exhibit is misleading because it is incomplete and taken out of context. (FRE 106) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Untimely. The exhibit was not produced during discovery nor was the underlying dashboard shared with Plaintiffs.
1200	Every Child 2017 Annual Report	
1201	Every Child 2018 Bi-Annual Report & Annual Report	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated and is a draft. (FRE 901) • Lack of foundation.
1202	Every Child 2019 Bi-Annual Report & Annual Report	
1203	Every Child 2020 Bi-Annual Report & Annual Report	
1204	Every Child 2021 Bi-Annual Report	

1205	Every Child 2022 Mid-Year Report & Annual Report	
1206	Every Child 2023 Mid-Year Report & Annual Report	
1207	ODHS News Release re Every Child and DHS Launch My NeighbOR Emergency Response (Mar. 22, 2020)	
1208	Dept. of Human Services, Child Welfare, Safety Program Spotlight (Mar. 2023)	<ul style="list-style-type: none"> • Misabeled. • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1209	Child Specific Caregiver Supports Pilot Final Combined Data Report (May 1, 2022 - Sept. 30, 2023)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1210	2023 Comagine Health Qualified Residential Treatment Program (QRTP) Independent Assessment and Behavioral Rehabilitation Services (BRS) Eligibility Quarterly & Annual Reports	
1211	Email from Casey Family Programs Praising Gov. Kate Brown (Sept. 12, 2018)	<ul style="list-style-type: none"> • Hearsay. The exhibit contains an out-of-court statement offered into evidence to prove the truth of the matter asserted and is not subject to any hearsay exception. (FRE 801 and 802) • Authentication. The exhibit has not been properly authenticated. (FRE 901)
1212	Governor's Children's Cabinet Meeting Packet (Sept. 29, 2021)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1213	Public Knowledge Supplemental Assessment of Services for Youth Aging Out of Foster Care (Mar. 1, 2024)	<ul style="list-style-type: none"> • Plaintiffs' objections are contained in their motion to exclude Defendants' expert. <i>See</i> ECF 360.
1214	Summary of Public Knowledge Question 1: Safety - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.

1215	Summary of Public Knowledge Question 2: Agency Culture - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of Foundation.
1216	Summary of Public Knowledge Question 3: Data-Driven Decision Making - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901). • Lack of foundation.
1217	Summary of Public Knowledge Question 4: Recruitment, Retention, and the Support of Resource Parents - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1218	Summary of Public Knowledge Question 5: Permanence - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1219	Summary of Public Knowledge Question 6: Permanency Planning - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of Foundation.
1220	Summary of Public Knowledge Question 7: Individual Assessments - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1221	Summary of Public Knowledge Question 8: Service Provision - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.

1222	Summary of Public Knowledge Question 9: Case Planning - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1223	Summary of Public Knowledge Question 10: Preserving and Improving Connections Between Children and Their Families - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1224	Summary of Public Knowledge Question 11: Staffing Resources - Findings & Inquiry Protocols (PK Report 12/15/23)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1225	Summary of Public Knowledge Question 12: Independent Living - Findings & Inquiry Protocols (PK Report 3/1/24)	<ul style="list-style-type: none"> • Untimely. The exhibit was not produced during discovery. • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation.
1226	Moving from a Culture of Compliance and Risk-Avoidance to Continuous Quality Improvement (Nov. 2023)	<ul style="list-style-type: none"> • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of Foundation.
1227	Transcript of Episode 12, Our Oregon DHS, COVID-19 Update (June 11, 2020), retrieved from https://sharedsystems.dhsoha.state.or.us/DHForms/Served/DE%20COVID-19%20EP12.pdf .	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402)
1228	Dept. of Health and Human Services, Administration for Children & Families, Letter to Child Welfare Leaders re COVID- 19 Guidance (Mar. 18, 2020)	

1229	Certified Copy of Order re Naomi B. - contains confidential/AEO information	
1230	Certified Copy of Order re Kylie R. - contains confidential/AEO information	
1231	Certified Copy of Order re Alec R. - contains confidential/AEO information	
1232	Certified Copy of Judgment re Norman N. - contains confidential/AEO information	
1233	Certified Copy of Order and Judgment re Ruth T. - contains confidential/AEO information	
1234	Certified Copy of Judgment re Wyatt B. - contains confidential/AEO information	
1235	Certified Copy of Judgment re Noah F. - contains confidential/AEO information	
1236	Certified Copy of Order and Judgment re Unique L. - contains confidential/AEO information	
1237	Certified Copy of Orders, Motion, and Judgments re Simon S. - contains confidential/AEO information	
1238	Certified Copy of Order re Bernard C. - contains confidential/AEO information	
1239	Photographs	<ul style="list-style-type: none"> • Relevance. The exhibit is not probative of the claims or defenses at issue. (FRE 401, 402) • Authentication. The exhibit has not been properly authenticated. (FRE 901) • Lack of foundation. • Untimely. The exhibit was not produced during discovery.

DATED this 25th day of April, 2024

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